

1 the fact that we have evidence in this case that indicates  
2 that the costs are in the area, range, of \$30,000 to  
3 \$40,000, I think that's my recollection anyway, that's what  
4 it costs to activate a path. Or you want to say a receiving  
5 building or -- but that's what we've been told. Does that  
6 bring, does that give you any concern that figure?

7 THE WITNESS: No. I mean, on an average size  
8 building of 100 units, \$40,000 is probably about right.

9 MR. HOLT: Your Honor, I wasn't necessarily  
10 focusing on the total cost. If we could take a brief  
11 recess, I'd like to confer with Mr. Beckner. I may be able  
12 to shorten my questions.

13 JUDGE SIPPEL: All right. We'll take a five  
14 minute recess. It's ten after 11:00. We'll come back at  
15 quarter after 11:00 with the idea in mind of finishing this  
16 witness before lunch. Give us five minutes. Off the  
17 record.

18 (Whereupon, a brief recess was taken.)

19 JUDGE SIPPEL: Please be seated. Okay. We're  
20 back on the record. The witness is in the witness seat.  
21 You're still under oath, Mr. Milstein. Mr. Holt.

22 MR. HOLT: Your Honor, I think you'll be pleased  
23 to know that as a result of the break, I have nothing  
24 further to add.

25 JUDGE SIPPEL: Breaks are the most efficient way

1 of running hearings. Mr. Weber, I'm sorry.

2 MR. WEBER: Thank you, Your Honor.

3 CROSS EXAMINATION

4 BY MR. WEBER:

5 Q Mr. Milstein, if you can recall in the timeframe  
6 of late 1994 and early or rather -- yeah, 1994, early 1995,  
7 can you recall what percentage of the buildings receiving  
8 Liberty's service were newly constructed buildings as  
9 opposed to buildings that were already existing and  
10 receiving Time Warner service prior to being signed up with  
11 Liberty?

12 A Let me hear that one again, Joe.

13 Q Okay. Do you know what percentage of the  
14 buildings receiving Liberty service were newly constructed  
15 buildings, meaning they were not prior receiving service  
16 from Time Warner. They were newly constructed and Liberty  
17 was the first service provider?

18 A I don't recall the percentage, no.

19 Q Do you know if it's maybe as high as 25 percent?

20 A I would doubt it.

21 Q Are you aware that Time Warner at one time filed a  
22 petition against Liberty raising the issue that Liberty was  
23 providing service without authorization?

24 A Yes.

25 Q Do you know if the petition was filed before or

1 after Mr. Price spoke to you about the possibility of  
2 unauthorized provision of service?

3 A I don't recall.

4 Q When Mr. Price spoke to you about the possibility  
5 of unauthorized provision of service, do you recall if he  
6 raised the issue that it was from a Time Warner petition?

7 A I really don't know, don't recall exactly what the  
8 catalyst was. I have a recollection of approximately when  
9 it was, but not the exact catalyst.

10 Q Did there come a time or did Constantine &  
11 Partners ever ask you to review your files for documents  
12 related to this proceeding?

13 A Yes, I think they did.

14 Q And you did review your files?

15 A Yes.

16 Q Did anybody assist you in this review?

17 A No, I think I probably just told my secretary pull  
18 out the files and -- I don't know what -- they reviewed it  
19 with me. They may have handed me, you know, a file.

20 Q By they, who do you mean they?

21 A One of my secretaries. We have three secretaries  
22 in our office. Secretaries sort of move in and out. I'm  
23 not really sure who was my secretary at the time.

24 Q Do you know if they turned over all your files to  
25 Constantine & Partners or did they review them for the

1 documents relating to the proceedings?

2 A I think anything that Constantine asked for, we  
3 gave them.

4 Q And sitting here today you're confident that your  
5 files have been adequately searched for all relevant  
6 materials?

7 A I think we gave them free access to anything  
8 that's available. I wasn't determining what was relevant.

9 MR. WEBER: Thank you. Nothing further.

10 JUDGE SIPPEL: I just have one question. I hope  
11 it's just one question, maybe two or three. But on the same  
12 line. Going back to this reference to the cost of  
13 equipment, construction incident to activating a path or  
14 activating a building, as a matter of your business  
15 experience, has it ever occurred that a building has been  
16 for whatever reason unable to be activated whether it was  
17 because there hadn't been a license obtained or for some  
18 reason whatsoever, any reason whatsoever, that the \$30,000  
19 let's say all of this expenditure was made and the building  
20 was set to be activated, but for some reason or other, it  
21 wasn't activated? Did that ever happen?

22 THE WITNESS: No, I think after this, after this  
23 issue, after we found out that we had been delivering  
24 service without a license, we continued constructing  
25 buildings in anticipation of getting licenses and I think we

1 constructed 10 or 15 of them. So there was a period of time  
2 where no licenses were coming out of the FCC and we were  
3 continuing to build facilities.

4 JUDGE SIPPEL: Did it ever reach a point from a  
5 standpoint of your books and records or how you might write  
6 things off at the end of the year and you said that building  
7 is a loser or for some reason or another we're never going  
8 to bring that path on, on that particular building, so we  
9 have to reach another business decision as to what to do  
10 with the equipment?

11 THE WITNESS: No.

12 JUDGE SIPPEL: That doesn't, that's never  
13 happened.

14 THE WITNESS: No. I mean, there were buildings  
15 where we did, you know, where we may have had a test where  
16 we took, we had a temporary dish. We took the dish off the  
17 roof when we didn't sign a contract. But none that we ever  
18 built out and then pulled back from, no.

19 JUDGE SIPPEL: And how much would, when you say --  
20 what would be the cost of the dish?

21 THE WITNESS: Well, the dish is reusable. So that  
22 it's not a lost cause. The question is what's the mount?  
23 It's a few thousand dollars.

24 JUDGE SIPPEL: Okay. That's all I have.

25 //

## 1 REDIRECT EXAMINATION

2 BY MR. BEGLEITER:

3 Q Okay. There were some questions about your  
4 conversation with your brother. Tell me, where is your  
5 office in relation to your brother's office?

6 A We're in the same office.

7 Q You're in the same office.

8 A Yeah. He sits about four feet to my left.

9 Q Well, let me ask the question. And where is your  
10 desk in relation to his desk?

11 A We sit at a partner's desk.

12 Q And how far apart do you sit from one another?

13 A About the distance between the Judge and I.

14 Q And were you doing this in '94 and '95?

15 A Yeah, we've been doing this since 1989-90.

16 Q And do you talk to each other while you're sitting  
17 at the desk?

18 A Sure.

19 MR. BEGLEITER: That's it. I have no further  
20 questions.

21 JUDGE SIPPEL: Mr. Beckner.

22 MR. BECKNER: Your Honor, I'd like to follow up on  
23 an answer the witness gave to Mr. Weber's question in regard  
24 to the timing of his receiving information from Peter Price  
25 and the Time Warner FCC filing, the so-called reply that

1 raised the allegation of unlicensed operations if I might.

2 JUDGE SIPPEL: Well, he's already been asked, I  
3 mean, he's been asked that by at least three different lines  
4 of inquiry, one of them being your own.

5 MR. BECKNER: That's fine. There's an answer that  
6 he gave that was a surprise to me to Mr. Weber's question.  
7 And Mr. Weber and the Bureau of Standard, unusual position  
8 here. I don't know whether I'm allowed to follow up on it  
9 or not.

10 JUDGE SIPPEL: Well, it certainly is not -- his  
11 was cross examination. Your question would not be  
12 responding to anything that was asked on redirect.

13 MR. BECKNER: All right.

14 JUDGE SIPPEL: So I'm not going to open it up to  
15 that and what that might lead to.

16 MR. BECKNER: Well, I have no questions about the  
17 location of Mr. Milstein's desk.

18 JUDGE SIPPEL: All right. Okay. Then that's it.  
19 No questions, no more questions? All right. You're excused  
20 as a witness. My instructions, as it has been to all the  
21 witnesses during this session is that you're not to talk  
22 about your testimony to anybody who either testified before  
23 or afterwards. The best thing to do is just talk to your  
24 attorneys about it. But after we're finished this week,  
25 that will be, that prohibition will be lifted and your

1 attorneys will tell you. That's it. All right. you're  
2 excused, Mr. Milstein.

3 (Witness exits.)

4 JUDGE SIPPEL: Now, it's 25 after 11:00. We can  
5 take a break for lunch or we can start with another witness  
6 if he's here. Why don't we go off the record?

7 (Whereupon, a brief recess was taken.)

8 JUDGE SIPPEL: Back on the record. We're going to  
9 take a lunch recess at this time. It's close to 11:30. We  
10 will be back at quarter to one with Mr. Ontiveros. Mr.  
11 Spitzer.

12 MR. SPITZER: Just on the record I just wanted to  
13 clarify there was some colloquy before about Constantine &  
14 Partners files and what was or was not done with respect to  
15 that. I just wanted to clarify we searched those files. We  
16 did not put in the privilege log every document that was in  
17 those files and that was by agreement I believe, Mr. Weber,  
18 that we were not going to create a privileged log either for  
19 Wiley, Rein or Constantine. That was just literally an  
20 impossible task certainly within the timeframes we were  
21 talking about. And also there was nothing that was  
22 responsive that needed to be produced. It all came from the  
23 other sources. But we did conduct that examination.

24 JUDGE SIPPEL: All right. Who was raising that  
25 this morning? Mr. Holt?



1 MR. HOLT: Yes, Your Honor. I raised it. And the  
2 only thing that I was interested in knowing, now that we  
3 have more fully -- the hearing has really become focused on  
4 a certain period of time and my concern is if there's a  
5 document in the Constantine files that should have been  
6 listed on the privilege log because it was responsive to the  
7 document request but it wasn't. I'm interested in -- what  
8 I'd like to see is a list --

9 MR. BEGLEITER: We objected in writing, Your  
10 Honor.

11 JUDGE SIPPEL: No, no.

12 MR. BEGLEITER: We objected in writing and nobody  
13 challenged us.

14 JUDGE SIPPEL: No, this is going to be --

15 MR. SPITZER: I agree.

16 JUDGE SIPPEL: Yeah, well, it's been done.  
17 Whatever we were going to do with respect to privilege  
18 documents has been done. It's been gone through. Mr.  
19 Spitzer has represented again what they have done with  
20 respect to searching their own files. I can assure you that  
21 if any document is uncovered that is really a hot document  
22 that hasn't been turned over after we shut down this hearing  
23 now that somebody's going to be in a lot of trouble. And  
24 everybody knows that. So I'm not as concerned about it as I  
25 was back last April.

1 MR. HOLT: Yes, Your Honor. And I guess just to  
2 explain my concern. If there is a document that has not --  
3 that is relevant to this proceeding that has not been  
4 scheduled by Constantine & Partners and a privilege log  
5 because it has made an agreement with the Bureau that it  
6 need not schedule those documents, I have concern that we're  
7 not being able to fully examine the witnesses about some  
8 dates and conversations that may have occurred around this  
9 relevant time period and that there were -- and if there's  
10 never any promulgation created for them to schedule the  
11 documents, we may never have the ability to inquire about  
12 relevant facts. I guess that's my concern.

13 JUDGE SIPPEL: Well, it's going to be a while  
14 before this record is absolutely closed and you'll have time  
15 to talk this out with Mr. Weber and with other counsel. And  
16 if there's something that really is, I mean, I will listen  
17 within reason to what -- if somebody has a real concern, but  
18 I don't hear it now. I mean, this is all speculative.

19 MR. SPITZER: And I'd also just add, Your Honor,  
20 what was done and not done was indicated to counsel via  
21 letters that were very clear on this issue it must be nine,  
22 ten months ago. So this is not anything new.

23 JUDGE SIPPEL: I don't want to have to read those  
24 letters again really. I mean, unless you've really got  
25 something, a real focus. And as I say, you've got the

1 concerns are self-evident as far as I see it in terms of  
2 being sure that we got everything, we meaning everybody  
3 involved in this case, has everything they're entitled to.  
4 So with the exception of one investigative report that I  
5 have different views about, but we're not going to talk  
6 about that here, right? So that's it. All right. We're in  
7 recess. You're cutting into your lunch hour. We're back at  
8 quarter of 1:00. Thank you.

9 (Whereupon, a lunch break was taken from 11:30  
10 a.m. to 12:45 p.m.)

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12:45 p.m.

MR. BEGLEITER: Yes, Your Honor. We call Anthony Ontiveros.

ANTHONY ONTIVEROS

## DIRECT EXAMINATION

Q Mr. Ontiveros, for the record, could you give your full name?

A     It's Anthony Ontiveros.

Q Spell it for the Court please?

A     Sure.  It's O-n-t-i-v-e-r-o-s.

Q Give us your home and business address please.

A      My home address is 523 Spring Avenue. That's in  
Ridgewood, New Jersey. My work address is 215 East 95th  
Street, New York, New York.

Q And sir, can you tell us what your education was please?

A High school, some college.

1 Q By whom are you currently employed?

2 A RCN.

3 Q When did you become employed by RCN?

4 A Spring of '96.

5 Q And do you have a title at RCN?

6 A Currently the Director of Operations.

7 Q And who were you employed by prior to your  
8 employment with RCN?

9 A Prior to my employment with RCN was Liberty Cable.

10 Q Can you tell me when you started with Liberty  
11 Cable?

12 A 1986.

13 Q And when did you stop working for Liberty Cable?

14 A The spring of 1996.

15 Q And who were you employed by before Liberty Cable?

16 A Before Liberty Cable, I was employed by a company  
17 called Hotel Entertainment Network.

18 Q And what did that company do?

19 A Provided pay per view movies, hotels going to a  
20 room, press a button, watch a movie. Pay for it when you  
21 leave.

22 Q Okay. And did that job have any FCC licensing  
23 aspects to it?

24 A No.

25 Q You say you began with Liberty in 1986?

1 A Correct.

2 Q Tell me, sir, what were your duties, what were  
3 your duties when you were hired by Liberty?

4 A My duties, it was really -- Liberty had just  
5 started. A handful of employees. We were building a cable  
6 satellite master antennae or cable tv company, telephone  
7 company and wore a lot of hats, from putting together  
8 billing systems to buying equipment to signing up customers,  
9 installing customers.

10 Q Did you have a title when you came to Liberty?

11 A Yes.

12 Q What was your title?

13 A General Manager.

14 Q Now, in the years 1986 to let's say 1990, did  
15 Liberty have 18 gigahertz systems?

16 A No.

17 Q How did Liberty get it's -- how did Liberty  
18 distribute its signal?

19 A We had stand alone satellite antennas on various  
20 rooftops of buildings. And picked up the signal off of  
21 either satellite antennas or off their antennas to get the  
22 local network channels. And then that was just piped into  
23 the building.

24 Q Did either of those satellite antennas or master  
25 antennas systems require FCC licensing?

1 A No.

2 Q Did a change occur sometime in the early 90s in  
3 which licenses were required?

4 A Well in 1991 Liberty Cable began to use microwave  
5 18 gigahertz frequency. And so from that point on, yes.  
6 And there was also some other you know changes with our  
7 management and we had some new people come on board to --

8 Q Okay. So was there a change in the company's  
9 product in 1991?

10 A Yes.

11 Q Okay. And was 18 gigahertz used from then on?

12 A Yes for the most part. We had you know still a  
13 system or two that used the older technology.

14 Q To your understanding were FCC licenses necessary  
15 for 18 gigahertz?

16 A Yes.

17 Q Now sir, if you can tell me since Liberty began  
18 using 18 gigahertz what your duties for the company have  
19 been?

20 A When the 1991 period forward, new management come  
21 on board. My responsibilities narrowed a bit. I wasn't  
22 responsible for marketing anymore. Primarily it was  
23 customer service, new installations, building installations,  
24 service, maintenance, billing you know those kind of things.

25 Q Were you also in charge of construction?

1 A Yes.

2 Q Can you tell us what first of all, construction  
3 entails for Liberty from 1991 until you left in 1996?

4 A Okay. New building construction. There were a  
5 few components. One was the microwave portion. The  
6 antennae was put -- you know constructed on a roof. Within  
7 the building distribution was created to serve the new --  
8 new customers.

9 Q Was it your responsibility to -- was it your  
10 responsibility to oversee the construction of the building?

11 A Yes.

12 Q And did you have a staff for that?

13 A Yes.

14 Q And what was your department called?

15 A Technical operations.

16 Q Okay. And did you have a title?

17 A It was you know again, small company. General  
18 Manager of Operations.

19 Q Okay. And you said you oversaw construction.  
20 What's installation. How does installation differ from  
21 construction?

22 A For me anyway, installation is the actual  
23 installing of the customer from the you know you take it  
24 through the whole process. It's -- we had a building  
25 contract. All that construction I mentioned to you takes



1 place. And then we actually do the installation for that  
2 customer.

3 Typically the marketing material is sent out. The  
4 customer elects to take our service. The paperwork gets  
5 returned. We put together a team of people, small team of  
6 people, project coordinator, you know installer, someone  
7 from customer service to kind of put that new account into  
8 our system.

9 Q Okay. And you also said you were in charge of  
10 maintenance. What does maintenance entail?

11 A Maintenance is just the upkeep of the entire  
12 system. Electronics making sure that they stay on that our  
13 cable system has all the programming its supposed to have  
14 and a customer has the good quality service in the  
15 apartment.

16 Q Well what is customer service? You mentioned you  
17 were in charge of customer service? What does that entail?

18 A And again, that also changed. You were talking to  
19 me up to a particular point as we kind of gone into the  
20 middle '90s, customer service there was a Director of  
21 Customer Service, but at that point had entailed just taking  
22 phone calls for new installations, service problems,  
23 disconnects, inquiries about their billing, new products.

24 Q Did you have people let's say from 1991 through  
25 the -- through let's say May of 1995, did you have people

1 who were employed under you by Liberty who were -- who would  
2 do the actual construction in the buildings?

3 A Yes.

4 Q Okay and would do the installation in the  
5 buildings?

6 A Correct.

7 Q And would do the maintenance?

8 A Yes.

9 Q How about repair?

10 A Yes.

11 Q In this entire -- let's focus now on the period  
12 1994 to 1995. First of all, in that period of all of 1994  
13 and let's say the first half of 1995, did you have a  
14 supervisor?

15 A '94 to '95?

16 Q Yeah.

17 A Yes.

18 Q Who would you report to?

19 A Peter Price.

20 Q And did you in turn have people working for you?

21 A Yes.

22 Q And was that people in the Technical Operations  
23 Department?

24 A Correct.

25 Q How many of those -- how many people worked in the

1 Technical Operations Department?

2 A At that time, probably somewhere in the 30 range,  
3 a little less.

4 Q Was Behrooz Nourain one of the people in the  
5 Technical Operations Department?

6 A Yes.

7 Q Was there a separate subdivision of that  
8 department that he was in?

9 A Of Technical Operations?

10 Q Yeah.

11 A Yes.

12 Q What was that called?

13 A The Microwave Department.

14 Q Okay. And how many people if any worked with Mr.  
15 Nourain in this period of '94 to '95 in the Microwave  
16 Department?

17 A One maybe two.

18 Q And what was -- what was Mr. Nourain's duties in  
19 those -- in that approximately year, year and a half?

20 A Behrooz was responsible for the construction,  
21 installation or you know installation of that equipment,  
22 licensing everything and anything to do with microwave.

23 Q Did you supervise Mr. Nourain on this microwave  
24 related activity?

25 A I probably should have, but no not really.

1 Q Okay. You say you probably should have. But did  
2 you actually supervise him?

3 A No.

4 Q Okay.

5 A Except for where it came into you know the actual  
6 construction of the building you know we're getting access  
7 to the building or whatever.

8 Q Let's -- let's go back a moment. Do you remember  
9 when Mr. Nourain started with the company?

10 A Probably the beginning first quarter of '92.

11 Q Were you involved with the hiring of Mr. Nourain ?

12 A Yes.

13 Q Tell me who else was involved?

14 A At that time it was Bruce McKinnon, Peter Price  
15 and we had a consultant at the time whose name was Joe  
16 Stern.

17 Q Can you tell me who was primarily responsible for  
18 the decision to hire Mr. Nourain?

19 A I would say the person with the most weight would  
20 have been Joe Stern.

21 Q Joe Stern was an engineer?

22 A Correct.

23 Q Now prior to Mr. Nourain coming to Liberty, who  
24 was in charge of licensing for -- for the company?

25 A I'm not positive but I know that Bruce McKinnon,

1 Peter Price we had a law firm -- Washington law firm who  
2 handled some of that.

3 Q Was Mr. Stern involved?

4 A Yes.

5 Q Do you know why Mr. Nourain was hired?

6 A To take care of our -- all our microwave issues,  
7 installation, licensing all those kind of things. Mr. Stern  
8 had been doing that.

9 Q Was Mr. Nourain hired to help secure FCC  
10 authorizations for 18 gigahertz?

11 A Yes.

12 Q At the time that he was hired, did you believe  
13 that Mr. Nourain had the requisite knowledge for FCC -- of  
14 FCC procedures for 18 gigahertz licenses?

15 A He appeared to be, yes.

16 Q Okay. Did you know anything about FCC procedures  
17 for 18 gigahertz then?

18 A Unfortunately, no.

19 Q Do you know anything about it now?

20 A I know -- I should know a lot but I know a lot  
21 more than I used to.

22 Q When did you start learning about it?

23 A Spring Summer of 1995.

24 Q Was that after you discovered that Liberty -- I'll  
25 withdraw the question. Mr. Ontiveros between the time that

1 Mr. Nourain arrived at Liberty, until May of 1995, did you  
2 have any licensing responsibilities at the company at all?

3 A No.

4 Q Okay. Now you indicated that Mr. Nourain reported  
5 to you.

6 A Yes.

7 Q In this period. Did Mr. Nourain -- did you track  
8 Mr. Nourain's performance with regard to licenses?

9 A No.

10 Q Did you know when he was applying for a -- when he  
11 -- when a license was applied for?

12 A No.

13 Q Did the company in any way to your knowledge keep  
14 track of which licenses were applied for?

15 A We're talking about everything prior --

16 Q 1994 to mid '95.

17 A I'm not aware.

18 Q Now if you didn't supervise Mr. Nourain, do you  
19 know who did? For this licensing function?

20 A Well yes. I mean Behrooz, Peter Price and our  
21 Washington lawyers. That was the group of people who  
22 handled that.

23 Q Do you know whether any of those people kept track  
24 of which licenses -- withdrawn. Do you know if any of those  
25 people reconciled the licenses applied for as -- as with the

1 paths actually activated?

2 A No.

3 Q Now have you ever prior to May 1995 participated  
4 in the preparation of a license?

5 A No.

6 Q Do you know what an STA is?

7 A Yes.

8 Q What's an STA?

9 A I know what it stands for.

10 Q What?

11 A It stands for special temporary authority.

12 Q Prior to May 1995 had you ever participated in the  
13 preparation of an STA?

14 A No.

15 Q Okay. Prior to May 1995, had you ever reviewed an  
16 application for a license before it was filed?

17 A No.

18 Q Prior to May 1995 have you ever reviewed an  
19 application or request for an STA before it was filed?

20 A No.

21 Q Would you be informed by anyone that an  
22 application was being filed for a license?

23 A Prior to -- again '95?

24 Q Prior to '95.

25 A No.

1 Q Would you be informed by anyone that an STA was  
2 going to be requested before it was -- before the request  
3 went to the FCC?

4 A No.

5 Q Would you know how to complete the technical  
6 information necessary for a license?

7 A No.

8 Q Do you have any microwave background?

9 A No.

10 Q Any radio background?

11 A No.

12 Q Did you ever prior to April '95 consult with  
13 Pepper & Corazzini about a license?

14 A No.

15 Q Did you ever prior to April '95 consult Pepper &  
16 Corazzini with regard to an STA?

17 A No.

18 Q Now did you view your job prior to May 1995 as  
19 having any licensing responsibilities?

20 A No.

21 Q Would you ever receive documents prior to May 1995  
22 that related to licenses or STAs?

23 A Yeah I might have.

24 Q Did you ever pay attention to those documents?

25 A No.



1 Q Why not?

2 A It -- it wasn't -- it wasn't my job  
3 responsibility. I know that sounds horrible, but it wasn't  
4 something I really focussed on. It was small company -- I  
5 had my issues to deal with and I thought we were in good  
6 hands.

7 Q When you say you thought you were in good hands,  
8 who's good hands did you think you were in?

9 A Well I thought again Behrooz and our Washington  
10 lawyers, Peter Price.

11 Q Now in this 1994 -- let's go back a moment. You  
12 mentioned a name Bruce McKinnon. Who's Bruce McKinnon?

13 A He was the VP of Operations.

14 Q And do you know when he came on?

15 A Well summer of '91.

16 Q And do you know when he left?

17 A Spring of '93.

18 Q While he was at Liberty do you know if he had  
19 any -- any licensing responsibilities?

20 A I think he did.

21 Q What was the chain of command before Mr. McKinnon  
22 left?

23 A For me?

24 Q Yeah.

25 A I reported to Mr. McKinnon. Mr. McKinnon reported